

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**DECLARATION OF MICHAEL E. BLOOM IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL**

I, Michael E. Bloom, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am a partner at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Request for Production to Defendants dated October 17, 2022.

4. Attached as Exhibit 2 is a true and correct copy of Plaintiffs' Second Set of Requests for Production to Defendant My Pillow, Inc. dated October 17, 2022.

5. Attached as Exhibit 3 is a true and correct copy of Plaintiffs' First Set of Interrogatories to Defendants dated October 17, 2022.

6. Attached as Exhibit 4 is a true and correct copy of Plaintiffs' Second Set of Interrogatories to Defendant My Pillow, Inc. dated October 17, 2022.

7. Attached as Exhibit 5 is a true and correct copy of Defendants' Responses to Plaintiffs' First Set of Requests for Production dated December 5, 2022.

8. Attached as Exhibit 6 is a true and correct copy of Defendant My Pillow, Inc.'s Responses to Plaintiffs' Second Set of Requests for Production dated December 5, 2022.

9. Attached as Exhibit 7 is a true and correct copy of Defendant My Pillow, Inc.'s Answers and Objections to Plaintiffs' First Set of Interrogatories dated December 5, 2022.

10. Attached as Exhibit 8 is a true and correct copy of Defendant Michael J. Lindell's Answers to Plaintiffs' First Set of Interrogatories dated December 5, 2022.

11. Attached as Exhibit 9 is a true and correct copy of Defendant My Pillow, Inc.'s Answers and Objections to Plaintiffs' Second Set of Interrogatories dated December 5, 2022.

12. Attached as Exhibit 10 is a true and correct copy of a December 14, 2022 letter I sent to Matthew Eslick, counsel for Defendants.

13. Attached as Exhibit 11 is a true and correct copy of a December 21, 2022 letter I received from Matthew Eslick, counsel for Defendants.

14. Attached as Exhibit 12 is a true and correct copy of a December 22, 2022 letter from Julie Loftus, counsel for Smartmatic, to Matthew Eslick, counsel for Defendants.

15. Attached as Exhibit 13 is a true and correct copy of a December 27, 2022 letter from Julie Loftus, counsel for Smartmatic, to Matthew Eslick, counsel for Defendants.

16. Attached as Exhibit 14 is a true and correct copy of Defendants' Supplemental Responses to Plaintiffs' First Set of Requests for Production dated January 3, 2023.

17. Attached as Exhibit 15 is a true and correct copy of Defendant My Pillow, Inc.'s Supplemental Responses to Plaintiffs' First Set of Requests for Production dated January 3, 2023.

18. Attached as Exhibit 16 is a true and correct copy of a January 6, 2023 letter from Julie Loftus, counsel for Smartmatic, to Matthew Eslick, counsel for Defendants.

19. Attached as Exhibit 17 is a true and correct copy of a January 13, 2023 letter from Julie Loftus, counsel for Smartmatic, to Matthew Eslick, counsel for Defendants.

20. Attached as Exhibit 18 is a true and correct copy of a January 19, 2023 email exchange between Julie Loftus, counsel for Smartmatic, and Matthew Eslick, counsel for Defendants.

21. Attached as Exhibit 19 is a true and correct copy of Defendant Michael J. Lindell's Supplemental Answers and Objections to Plaintiffs' First Set of Interrogatories dated January 3, 2023.


22. Attached as Exhibit 20 is a true and correct copy of Defendant My Pillow, Inc.'s Supplemental Answers and Objections to Plaintiffs' First Set of Interrogatories dated January 11, 2023.

23. Attached as Exhibit 21 is a true and correct copy of Defendant My Pillow, Inc.'s Supplemental Answers and Objections to Plaintiffs' Second Set of Interrogatories dated January 11, 2023.

24. Attached as Exhibit 22 is a true and correct copy of a December 30, 2022 letter from Julie Loftus, counsel for Smartmatic, to Matthew Eslick, counsel for Defendants.

25. Attached as Exhibit 23 is a true and correct copy of a January 4, 2023 letter I received from Matthew Eslick, counsel for Defendants.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Michael E. Bloom

Executed on February 1, 2023.